

Before The  
Federal Communications Commission

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
Universal Service Support	)	
	)	
Connect America Fund	)	WC Docket No. 10-90

**Comments of  
The Missouri Telecommunications Industry Association**

The Missouri Telecommunications Industry Association (“MTIA”)<sup>1</sup> supports the Petition for Waiver filed by the United States Telecom Association (“US Telecom”). As described in the comments filed by the Missouri Public Service Commission (“MoPSC”), Missouri is a state that:

(1) offers \$6.50 in state Lifeline support, and

(2) has its own state Lifeline rules.<sup>2</sup>

Although the MTIA and its member companies have been working with MoPSC Staff to revise Missouri’s Lifeline rules to match the new Federal Communications Commission (“FCC”) rules, these rule changes will take time and cannot be accomplished by December of 2016.<sup>3</sup>

Accordingly, the MTIA supports US Telecom’s Petition for Waiver.

---

<sup>1</sup> The MTIA is a not-for-profit trade association that represents the interests of Missouri’s telecommunications providers in matters of state legislative and regulatory public policy.

<sup>2</sup> MoPSC Comments filed Oct. 19, 2016, pp. 2-3, citing the Missouri Code of State Regulations at 4 CSR 240-31.

<sup>3</sup> MoPSC Comments, pp. 3-4 explaining, “Missouri’s rulemaking process is lengthy . . . As a general rule a minimum of six months is needed to complete a formal rulemaking. . . [Thus,] Missouri will not meet the December 2, 2016 deadline for revising its rules to be consistent with recent FCC reforms.”

Respectfully submitted,

**/s/ Richard Telthorst**

Richard Telthorst, President and CEO  
Missouri Telecommunications Industry Association  
Post Office Box 785  
312 East Capitol Avenue  
Jefferson City, Missouri 65102